

FILED

JUL 07 2021

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

Criminal No. 5:21-CR- 19

ROBERT EUGENE WILSON,
Defendant.

UNITED STATES' MOTION FOR ORDER TO SEAL

Now comes the United States of America and Randolph J. Bernard, Acting United States Attorney for the Northern District of West Virginia, by David J. Perri, Assistant United States Attorney, for said District.

The United States moves the Court to seal this matter. The documents and proceedings in this matter relate to an ongoing investigation. If the matter is not sealed, the integrity of the investigation will be compromised.

WHEREFORE, the United States moves the Court to seal this matter until the arrest of any defendant upon the charges listed in the indictment.

Memorandum of Law

"The common law qualified right of access to the warrant papers is committed to the sound discretion of the judicial officer who issued the warrant...the officer may file all or some of the papers under seal for a stated time or until further order." Baltimore Sun Company v. Goetz, 886 F.2d 60, 65 (4th Cir. 1989).

Respectfully submitted,

RANDOLPH J. BERNARD
Acting United States Attorney

By: /s/ David J. Perri
David J. Perri
Assistant United States Attorney